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*Clarendon National Insurance*  
*Company and Clarendon America*  
*Insurance Company*

UNITED STATES DISTRICT COURT  
 SOUTHERN DISTRICT OF NEW YORK

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CLARENDON NATIONAL INSURANCE	:	
COMPANY and CLARENDON AMERICA	:	
INSURANCE COMPANY,	:	
	:	09 cv 9896 (BSJ)
Plaintiffs,	:	
	:	
v.	:	
	:	
TRUSTMARK INSURANCE COMPANY,	:	
	:	
	:	
Defendants.	:	
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**SUMMARY JUDGMENT RESPONSE DECLARATION OF BRIAN P. KEENAN**


Brian P. Keenan, pursuant to 28 U.S.C. § 1746, declares as follows:

1. I am an attorney representing plaintiffs Clarendon National Insurance Company and Clarendon America Insurance Company (collectively “Clarendon”) in the above-captioned action. I make this declaration based on my personal knowledge.
2. Attached to this declaration as Exhibit 66 is a true and correct copy of a June 1, 2007 billing from Trustmark to Clarendon for the 1998 International Treaties, produced by Trustmark in this litigation.
3. Attached to this declaration as Exhibits 67 is a true and correct copy of a May 21, 2007 billing from Trustmark to Clarendon for the 1998 VQS Treaty, produced by Trustmark in this litigation.
4. Attached to this declaration as Exhibit A is a true and correct copy of portions of the deposition of Raymond Lester, both in his individual capacity and as Trustmark’s Rule 30(b)(6) representative, taken in this action on August 5, 2010.
5. Attached to this declaration as Exhibit B is a true and correct copy of portions of the deposition of Patrick Fee, taken in this action on September 9, 2010.

6. Attached to this declaration as Exhibit C is a true and correct copy of portions of the deposition of Robert Redpath, taken in this action on September 30, 2010.

I DECLARE UNDER PENALTY OF PERJURY OF THE LAWS OF THE UNITED STATES THAT THE FOREGOING IS TRUE AND CORRECT.

Executed on December 20, 2010

  
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Brian P. Keenan